

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW MEXICO

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	
vs.)	No. 14-CR-415-JP
)	
ANTHONY CHEUN,)	
)	
Defendant.)	

**MOTION TO DISMISS COUNTS 1 and 2 of
INDICTMENT WITH PREJUDICE AS TO ANTHONY CHEUN**

The United States of America, by and through Damon P. Martinez, United States Attorney for the District of New Mexico, and William P. Pflugrath, Assistant U. S. Attorney for said district, hereby move this Court for an order dismissing Counts 1 and 2 of the Indictment filed on February 12, 2014, on the grounds Defendant Anthony Cheun entered into a Plea Agreement on February 23, 2015.

WHEREFORE, for the foregoing reasons, the United States respectfully requests Counts 1 and 2 of the Indictment filed on February 12, 2014 be dismissed with prejudice as to Defendant Anthony Cheun.

Respectfully submitted,

DAMON P. MARTINEZ
United States Attorney

Electronically filed 1/4/16
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I HEREBY CERTIFY that on the 4th day of January, 2016, I filed the foregoing pleading electronically through the CM/ECF system, which caused counsel of record to be served by electronic means.

Electronically filed on 1/4/16

William P. Pflugrath

Assistant United States Attorney